

From
Cathy Zeller
621-3828

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1. Article Addressed to:

Mr. Richard Coyle
Director of Operations
Tropicana Products, Inc.
6500 Glades Cutoff Road
Ft. Pierce, FL 34981

2. Article Number (Copy from service label)

7000 0600 0021 6524 3615

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **FS** B. Date of Delivery **8-20-01**

C. Signature **John Finckberg** ☐ Agent ☐ Addressee
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PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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Mr. Richard Coyle, Dir. of Operations

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6500 Glades Cutoff Rd.

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Ft. Pierce, FL 34981

PS Form 3800, July 1999

See Reverse for Instructions

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Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

August 17, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Coyle
Director of Operations
Tropicana Products, Inc.
6500 Glades Cutoff Road
Ft. Pierce, Florida 34981

Re: Request for Additional Information
DEP File No. 1110004-004-AC, PSD-FL-303A
Addition of Process Steam Boiler

Dear Mr. Coyle:

On July 18, 2001 the Department received your application and complete fee for an air construction permit to add a process steam boiler to the existing Tropicana Products, Inc., Ft. Pierce plant. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please provide an ambient air quality impacts analysis (AAQS) for sulfur dioxide for the 24-hour averaging time. As described in the application, this boiler is part of the previous PSD project for the addition of juice extractors. Because this is part of the same project, an isolated analysis is not acceptable. In addition, the maximum 24-hour SO_2 predicted impact for that project was $258 \mu\text{g}/\text{m}^3$, which is very close to the Florida AAQS of $260 \mu\text{g}/\text{m}^3$. The maximum impact predicted for this boiler is $4.8 \mu\text{g}/\text{m}^3$, which, if added to the previously predicted impact of $258 \mu\text{g}/\text{m}^3$, would result in impacts exceeding the AAQS. However, because of the limited additional impact from the proposed boiler for other SO_2 averaging times and other pollutants, it appears that an analysis is only required to determine the maximum 24-hour average SO_2 impact.
2. Please provide supporting information for the manufacturer's guarantees for NO_x and CO emissions.
3. Please provide information that describes the design of the flue gas recirculation system for the proposed boiler model, and describe how the boiler is designed to control the rate of recirculation through the operating heat input range of the boiler. Additionally, what is the boiler's design turndown ratio? Please also describe the design of the burner(s) that will be used with the proposed boiler model.
4. Please show the calculations for the sulfuric acid mist emission factor for natural gas firing.
5. Are the heat input rates of less than 100 mmBtu/hour the actual design capacities of the boiler for each fuel, or will heat input be limited to avoid NSPS Subpart Db applicability? If limited, please

"More Protection, Less Process"

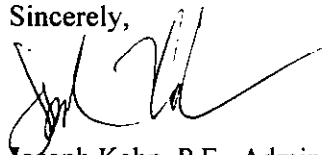
Printed on recycled paper.

Mr. Richard Coyle
Request for Additional Information
Page 2 of 2
August 17, 2001

describe the manner in which heat input will be limited. Will fuel consumption be separately metered for this boiler?

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/921-9509. Matters regarding modeling issues should be directed to Cleve Holladay (meteorologist) at 850/921-8986.

Sincerely,



Joseph Kahn, P.E., Administrator
Emissions Monitoring Section
Bureau of Air Monitoring and
Mobile Sources

/jk

cc: Mr. Gregg Worley, EPA
Mr. John Bunyak, NPS
Mr. Isidore Goldman, P.E., DEP SE District
Mr. Ken Kosky, P.E., Golder Associates

AFFIDAVIT OF PUBLICATION
THE LEDGER
Lakeland, Polk County, Florida

RECEIVED

Case No

JUL 11 2001

STATE OF FLORIDA)
COUNTY OF POLK)

BUREAU OF AIR REGULATION

Before the undersigned authority personally appeared Ken Holtzinger, who on oath says that he is the Classified Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Notice of Intent

in the matter of..... **CPV Pierce Power Generating Facility**

in the.....

Court, was published in said newspaper in the issues of.....

7-7, 2001

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed.....
Ken Holtzinger
Classified Manager
Who is personally known to me.

Sworn to and subscribed before me this.....

day of July..... A.D. 2001

Patricia Ann Rouse
Notary Public

PATRICIA ANN ROUSE



(Seal)

My Commission Expires.....

Attach Notice Here

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIP File No. 1050349 001-AC and PSD-FL-319

CPV Pierce Power Generating Facility
Combined Cycle Power Project
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to CPV Pierce Ltd. The permit is to construct a combined cycle electrical power generating plant in Pierce, in Polk County. A Best Available Control Technology (BACT) determination was required pursuant to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration of Air Quality (PSD), for emissions of particulate matter (PM/PM₁₀), carbon monoxide (CO), sulfur dioxide (SO₂), sulfuric acid mist, and nitrogen oxides (NO_x). A maximum achievable control technology (MACT) determination for hazardous air pollutants was not required. The applicant's name and address are CPV Pierce Ltd., 35 Brimfield Mill Office Park, Suite 107, Braintree, Massachusetts 02184. The project consists of a nominal 170 megawatt General Electric JFA combustion turbine electrical generator, an indirect-fired recovery steam generator, a separate steam electrical generator, a 175 foot stack, a mechanical draft cooling tower, a zero waste water discharge system, a 1.0 million gallon fuel oil storage tank, and other ancillary equipment. Back-up distillate fuel oil will be burned for a maximum of 720 hours per year. NO_x emissions will be controlled by selective catalytic reduction (SCR) to achieve 2.5 parts per million by volume, dry, at 15 percent oxygen (ppmv) while burning gas and 10 ppmv while burning low sulfur distillate fuel oil. Emissions of CO will be controlled to 9 and 20 ppmv while burning gas and fuel oil respectively. Emissions of PM/PM₁₀, SO₂, sulfuric acid mist, volatile organic compounds, and hazardous air pollutants (HAP) will be controlled to very low levels by good combustion and use of inherently clean pipeline quality natural gas and low sulfur (0.05 percent) distillate fuel oil. Ammonia emissions (NH₃) generated due to NO_x control will be limited to 5 ppmv.

The following table summarizes the maximum emissions (in tons per year) of regulated air pollutants as a result of this project:

Pollutants	Maximum Potential Emissions	PSD Significant Emission Rate
PM/PM ₁₀	51	25/15
Sulfuric Acid Mist	8	40
SO ₂	75	40
NO _x	97	40
VOC	15	40
CO	167	100
HAP	8	NA

An air quality impact analysis was conducted. Maximum impacts due to proposed emissions from the project are less than the applicable PSD Class II significant impact levels for all applicable pollutants. Therefore no air quality impact analysis was required. Emissions from the facility will not cause or contribute to a violation of any state or federal ambient air quality standards. The project has no significant impact on the PSD Class I Chassahowitzka National Wildlife Area.

The project is not subject to Section 403 501-516, F.S., Florida Electric Power Plant Siting Act, based on information regarding gross electrical power generated from the steam cycle submitted by the applicant and reviewed by the Department. The Department will issue the FINAL permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for a public meeting concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments and requests for a public meeting should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department will schedule a public hearing and require, if applicable, another Public Notice. The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of 3800 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.603 of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.603, however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding, and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because this administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding. In accordance with the requirements set forth above:

A complete project fee is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Dept. of Environmental Protection Southwest District Office 3804 Coconut Palm Dr Tampa, Florida 33619-8218 Telephone: 813/744-6100 Fax: 813/744-6173	Polk County Environmental Services Natural Resources & Drainage Division 4177 Ben Durand Road Barlow, Florida 33830 Telephone: 813/534-7377 Fax: 941/534-7374
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The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. Any documents can be accessed on <http://www8.flstate.com/ceos/sinca/submitting/appr/environ/air/psdpermit.html> by clicking on Utility and Other Facility Permits.

FS-48 7-7-2001



Competitive
Power Ventures, Inc.

August 1, 2001

RECEIVED

AUG 02 2001

BUREAU OF AIR REGULATION

Mr. Alvaro Linero, P.E.
Administrator, New Source Review Section
Bureau of Air Regulation
Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32399

Re: Comments on Draft PSD Permit for CPV Pierce, Ltd. Power Generating Facility, DEP File No.1050349-001-AC and PSD-FL-319

Dear Mr. Linero:

Pursuant to the Public Notice of Intent for the above-referenced matter, the permit applicant, CPV Pierce, Ltd., submits the following comments on the draft Prevention of Significant Deterioration ("PSD") permit for the CPV Pierce Power Generating Facility.

Draft Air Permit PSD-FL-319

1. On page 1 of the permit, the DEP File Number is incorrect. The file number needs to be corrected to DEP File No. 1050349-001-AC.
2. On pages 2 and 3 of the permit, the Air Construction Permit number in the header at the top of the page is incorrect and needs to be changed to Air Construction Permit 1050349-001-AC. Additionally, the PSD number in the header on pages 2 and 3 should be corrected to PSD-FL-319.
3. On page 1 and throughout the permit, the term "250 MW" should be changed to "245 MW," due to the MW limitation on the steam cycle.
4. On page 2 of the permit, in both the Facility Description and the Emissions Units table, the reference to the oil storage tank capacity should be corrected to 975,000 gallons, instead of 1million gallons.
5. On page 2 of the permit, the reference to the "ammonium storage" should be changed to "ammonia storage."
6. On page 3 of the permit, the reference to "The Tribune" should be corrected to "The Lakeland Ledger," per our previous discussion.

7. On pages 4 through 7, in the header entitled "Section II. Common Specific Conditions," the word "Conditions" contains a typographical error that should be corrected.
8. On page 4 of the permit, paragraph 9, CPV Pierce requests that the permit expiration date and construction deadline each be increased by six (6) months, to October 31, 2004 and June 30, 2004, respectively. This will enable CPV Pierce to complete its construction within the projected construction timeframe, with a time margin built in to accommodate potential short-term construction delays.
9. On page 5 of the permit, paragraph 11, the reference to April 30, 2004 should be changed to October 31, 2004, consistent with the previous comment.
10. On page 8 of the permit, condition 3, the distillate oil storage tank reference should be changed to "Emissions Unit 003" to be consistent with the emission unit table on page 2 of the permit.
11. On page 8 of the permit, paragraph 5, for consistency with the permit application, the reference to 1,700 million BTU per hour when firing natural gas should be changed to 1,680 million BTU per hour. Similarly, for consistency with the permit application, the reference to 1,918 million BTU per hour when firing distillate fuel oil should be changed to 1,898 BTU per hour.
12. On page 10 of the permit, paragraph 13a, the reference to CO emissions when firing natural gas, and in power augmentation mode, should be revised from 49 to 50 pounds per hour to be consistent with the data provided in Appendix C of the permit application.
13. On page 11 of the permit, condition 13b, in the third paragraph, the conditions "@ 15% O₂" should be inserted after 19 ppmvd to correct a typographical oversight. In addition, CPV Pierce requests that the operating range of 50-74 percent be revised to 50-75 percent, to encompass the data provided (75% load case firing distillate) in Appendix C of the application. As a result of this revision, the operating range of 75-89 percent should be revised to 76-89 percent.
14. On page 11 of the permit, paragraph 14, the reference to Condition No. "27" should be corrected to Condition No. "26."
15. On page 11 of the permit, paragraph 15, in the second sentence, the term "7s" should be corrected to "Conditions," and the reference to "28" should be corrected to "26."
16. On page 13, paragraph 21, the following sentence should be added to the end of the paragraph: "RATA data can substitute for annual compliance testing for CO and NO_x." CPV Pierce requests that this sentence be added to address the concern that annual compliance testing for CO and NO_x not be required in

addition to the CEM system testing that is required by Condition No. 19 of the permit, because such testing would be unnecessarily duplicative. CPV Pierce notes that pursuant to discussions with DEP Bureau of Air Regulation staff, this sentence was included in the CPV Atlantic permit (page 13 of 19 of the Atlantic permit, Condition No. 22) to address these same concerns.

17. On page 13 of the permit, paragraph 23, the reference to Specific Conditions 18 and 22 should be corrected to Conditions 17 and 21.
18. On page 19 of the permit, paragraph 37, the reference to "Constellation" should be corrected to CPV Pierce, per previous discussion.
19. On page 19 of the permit, paragraph 37, for clarity, CPV Pierce suggests that the word "gross" in the parenthetical be replaced with the words "as measured at the generator". The limit on steam turbine power production will be maintained on a rolling one-hour average basis. Accordingly, CPV Pierce suggests that the word "continuous", in the last sentence of the paragraph, be deleted and that the sentence be revised to read "CPV Pierce shall be capable of demonstrating to the Department, compliance with the 74.9 MW rolling one-hour average limit by the stored information in the power plant's electronic control data system".

Appendix BD (FDEP web site version)

Please note that the pagination of the web site version of Appendix BD differs from the version contained in the Department's transmittal of June 26, 2001 to CPV Pierce. The comments below are keyed to the version of Appendix BD from the Department's web site.

20. On page BD-1 of the BACT Determination, in the second paragraph, the reference to a 1 million gallon storage tank should be corrected to a 975,000 gallon storage tank, consistent with the revision requested in Comment No. 4, above.
21. On page BD-5 of the BACT Determination, the reference to the "National Park Service" should be corrected to the "U.S. Fish and Wildlife Service," which provided written comments on the permit application.
22. On page BD-12 of the BACT Determination, in the second complete paragraph, last sentence, in the parenthetical, substitute the word "production" for "combustion."
23. On page BD-13 of the BACT Determination, paragraph 3 makes reference to Figure 8; however, the reference should be to Figure 7.
24. On page BD-16, in the section entitled "Review of Volatile Organic Compound (VOC) Control Technologies," the paragraph states that CPV proposed VOC limits of 1.4 ppmvw for gas and 3.6 ppmvw for oil firing. However, CPV Pierce

- provided estimated VOC emission rates in Appendix C of the permit application, but did not propose any VOC limits in its application. Accordingly, this sentence should be deleted from that paragraph.
25. On page BD-16, in the section entitled "Background on Selected Gas Turbine," paragraph 2 references the Speedtronic Mark VI in the first sentence. For consistency, the reference in the fourth sentence should also be to the Speedtronic Mark VI.
 26. On page BD-16, last paragraph under the section entitled "Department BACT Determination," the reference in the last sentence to Specific Condition No. 17 should be corrected to Specific Condition No. 16, for consistency with the permit.
 27. On page BD-17, in the section entitled "Rationale for Department's Determination," in the fourth bullet paragraph, the references to the economic figures submitted by CPV should be changed to \$2606 and \$22,786, consistent with the figures submitted in the permit application.
 28. On page BD-17, in the section entitled "Rationale for Department's Determination," in the fifth bullet paragraph, the reference to \$5600 should be changed to \$5212, and the reference to \$12,500 should be changed to \$11,393, to be consistent with the figures submitted in the permit application.
 29. On page BD-18, in the third bullet paragraph, the estimated levelized costs for CO Catalyst Control of \$2,856 should be revised to \$2,824 to be consistent with the permit application.
 30. On page BD-19, in the first paragraph, under BACT Excess Emissions Approval, the reference to Specific Condition 24 of the permit with respect to the requirement to report excess NOx emissions periods should be revised to Specific Condition 23, in Section III, page 13 of 19 of the permit.

Appendix TE

31. On page TE-3 of the Technical Evaluation, in the "Facility Category" section, third paragraph, in the second sentence, CPV Pierce suggests that the word "present" be replaced with "proposed".
32. On page TE-3 of the Technical Evaluation, in the "Project Description" section, first paragraph following the table, the word "combined" should be inserted before "cycle."
33. On page TE-3 of the Technical Evaluation, the references to oil storage tank capacity should be corrected to 975,000 gallons, instead of 1 million gallons, consistent with the revision requested in Comment No. 4.

34. On page TE-3 of the Technical Evaluation, for consistency with the permit application and permit as revised per paragraph 11 above, the reference to 1,700 million BTU per hour when firing natural gas should be changed to 1,680 million BTU per hour. Similarly, for consistency with the permit application and permit as revised per paragraph 11 above, the reference to 1,918 million BTU per hour when firing distillate oil should be changed to 1,898 BTU per hour.
35. On page TE-5 of the Technical Evaluation, the third paragraph refers to "peaking" and the last sentence in that paragraph states that peaking is simply running the unit at greater than design fuel output. Since the CPV Pierce facility will not be a peaking unit, these references are not relevant to the CPV Pierce air permit, and, accordingly, CPV Pierce suggests they be deleted.
36. On page TE-6 of the Technical Evaluation, the reference in the last paragraph to Specific Condition No. 17 should be changed to Specific Condition No. 16, consistent with the permit.
37. On page TE-7 of the Technical Evaluation, in the table entitled "Facility Emissions (TPY) and PSD Applicability," in the "PSD Significance" column, the value for PM/PM₁₀ should be corrected to "25/15," rather than only "25," as currently stated in the table.
38. On page TE-7 of the Technical Evaluation, Section 6.2 entitled "Emissions Summary," a note should be added to the emission totals under PM/PM₁₀ for the columns entitled Gas Firing¹, Gas Firing², and Oil Firing to clarify that the tonnages shown represent calculation of tonnage as determined by EPA Method 5, front-half catch only.
39. On page TE-7, in Section 6.2, the footnotes relating to reference temperatures of 25° F should be amended to correctly indicate that power augmentation mode is applicable only at temperatures at or above 59° F.
40. On page TE-7 of the Technical Evaluation, it is stated that "[t]he DLN-2.6 combustors will control combustion turbine emissions of CO and NO_x to a 9 ppmvd @ 15% O₂...." The statement should be revised to reflect a CO rate of 8 ppmvd @ 15% O₂ to be consistent with the permit. Also, to be consistent with the draft permit condition 13b, the emission of CO during oil burning should be revised from 20 ppmvd to 17 ppmvd at 15% O₂ at 90% to 100% of full load.
41. On page TE-11 of the Technical Evaluation, the reference to "ENP" should be changed to the "CNWA."

We appreciate your consideration of these comments and the inclusion of the requested revisions in the final permit. If you have any questions, please do not hesitate to contact me.

Sincerely,



Patricia A. DiOno
Manager, Project Development
CPV Pierce, Ltd.

Cc: Gary Lambert, Executive Vice President
Cathy Sellers (Moyle Flanigan)
Michael Anderson (TRC)

D. Huron
C. Holladay
B. Thomas
G. Spence
B. Worley
G. Pierro



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 09 2001

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JUL 17 2001

4 APT-ARB

BUREAU OF AIR REGULATION

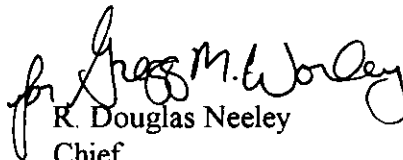
A. A. Linero, P.E.
FL Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Thank you for sending the preliminary determination and draft prevention of significant deterioration (PSD) permit for the CPV Pierce Power Generating Facility dated June 25, 2001. The draft PSD permit is for the installation of one combined cycle combustion turbine (CCCT) with an unfired heat recovery steam generator, cooling tower, fuel oil storage tank and other ancillary equipment. The proposed CCCT is a GE 7FA with a nominal electrical output of 170 MW. As proposed, the CCCT's main fuel will be natural gas, with fuel oil as back-up. The CCCT will be allowed to operate 8,760 hours per year, of which no more than 720 hours represent fuel oil operation. Total emissions from the proposed project are above the thresholds requiring PSD review for nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), carbon monoxide (CO) and sulfuric acid mist (SAM).

Based on our review of the preliminary determination and draft PSD permit, we do not have any additional comments beyond those previously submitted during our review of the PSD permit application and subsequent discussions with the Florida Department of Environmental Protection. If you have any questions, please direct them to either Mr. César Zapata at 404-562-9139 or Mr. Jim Little at 404-562-9118.

Sincerely,


R. Douglas Neeley
Chief

Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: J. Nye
C. Holladay
D. Fambert, CPU Prince
B. Thomas, SWP
G. Spence, Park Co.
G. Bunnell, NPS